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*Attorneys for Defendants Broadcom Inc., Broadcom Corporation and Avago Technologies International Sales Pte. Limited*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SAMSUNG ELECTRONICS CO., LTD.

Plaintiffs,

v.

BROADCOM INC., BROADCOM CORPORATION, AND AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED,

Defendant.

CASE NO. 3:24-cv-03959

**STIPULATION AND ~~PROPOSED~~  
 ORDER FOR EXTENSION OF TIME  
 FOR PLAINTIFF TO RESPOND TO  
 ANY MOTION FILED BY  
 DEFENDANTS IN RESPONSE TO  
 THE COMPLAINT AND  
 DEFENDANTS' REPLY PURSUANT  
 TO CIVIL LOCAL RULES 6-1(B) AND  
 6-2**

1 Plaintiff Samsung Electronics Co., Ltd. (“Plaintiff”) and Defendants Broadcom Inc.,  
 2 Broadcom Corporation, and Avago Technologies International Sales Pte. Limited (“Defendants”  
 3 and, together with Plaintiffs, the “Parties”), by and through their respective attorneys of record  
 4 herein and without waiving any rights, claims, or defenses they have in this action, enter into this  
 5 Stipulation pursuant to Civil Local Rules 6-1(b) and 6-2 with reference to the following  
 6 circumstances:

7 WHEREAS, Plaintiffs filed the Complaint on July 1, 2024 (ECF No. 1);

8 WHEREAS, Plaintiffs purported to have served Defendants with a copies of the Summons  
 9 and Complaint on July 3, 2024 (ECF Nos. 7–9);

10 WHEREAS, Defendants’ response to the Complaint is currently due on August 28, 2024  
 11 (ECF No. 18);

12 WHEREAS, counsel for the Parties conferred telephonically and by email and have agreed  
 13 to extend Plaintiff’s deadline to respond to any motion filed by Defendants in response to the  
 14 Complaint by 30 days to October 11, 2024 and the deadline for Defendants to file any reply in  
 15 support of their motion by 14 days to November 1, 2024;

16 WHEREAS, the stipulated extension would modify the time for responding to a motion  
 17 under Civil Local Rule 7-3(a), the time for filing a reply under Civil Local Rule 7-3(c), and the  
 18 timing of any hearing on such motion;

19 WHEREAS, the Parties have only otherwise stipulated to the extension of Defendants’  
 20 time to respond to the Complaint;

21 WHEREAS, the Parties agree that nothing in this Stipulation shall be construed as a waiver  
 22 of any Party’s rights or positions in law or in equity and that all Parties expressly reserve and do  
 23 not waive arguments or defenses that Party would otherwise have as of the date of this Stipulation.

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1 NOW THEREFORE, the Parties, through their respective attorneys of record, hereby  
2 stipulate and agree to extend Plaintiff's deadline to respond to any motion filed by Defendants in  
3 response to October 11, 2024 and the deadline for Defendants to file any reply in support of their  
4 motion to November 1, 2024.

5 **IT IS SO STIPULATED.**

6 *[Signatures on following page]*  
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1 Dated: July 23, 2024

LATHAM & WATKINS LLP

2 By: /s/ Belinda S Lee

Belinda S Lee

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12 *Attorneys for Defendants Broadcom Inc.,*

13 *Broadcom Corporation and Avago Technologies*

14 *International Sales Pte. Limited*

15 Dated: July 23, 2024

ARNOLD & PORTER LLP

16 By: /s/ Douglas A. Winthrop

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27 *Attorneys for Plaintiff Samsung Electronics Co.,*  
28 *Ltd.*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3 Dated: July 24, 2024



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The Honorable Laurel Beeler  
United States Magistrate Judge

**ATTESTATION**

I am the ECF user whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order For Extension Of Time For Plaintiff to Respond to Any Motion Filed by Defendants in Response to the Complaint Pursuant to Civil Local Rules 6-1(B) and 6-2. Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized such filing.

Dated: July 23, 2024

*/s/ Belinda S Lee*

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Belinda S Lee

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[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SAMSUNG ELECTRONICS CO., LTD.

Plaintiffs,

v.

BROADCOM INC., BROADCOM CORPORATION, AND AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED,

Defendant.

CASE NO. 3:24-cv-03959-LB

**DECLARATION IN SUPPORT OF  
 STIPULATION AND [PROPOSED]  
 ORDER FOR EXTENSION OF TIME  
 FOR PLAINTIFF TO RESPOND TO  
 ANY MOTION FILED BY  
 DEFENDANTS IN RESPONSE TO  
 THE COMPLAINT AND  
 DEFENDANTS' REPLY PURSUANT  
 TO CIVIL LOCAL RULE 6-1(B) AND  
 6-2**

1 I, Aaron T. Chiu, hereby declare as follows:

2 1. I am an attorney admitted to practice law in the state of California and a partner at  
3 Latham & Watkins LLP, counsel of record for defendants Broadcom Inc., Broadcom Corporation,  
4 and Avago Technologies International Sales Pte. Limited (collectively, "Defendants") in the  
5 above-captioned action.

6 2. I submit this declaration in support of the Parties' Stipulation and [Proposed] Order  
7 for Extension of Time for Plaintiff to Respond to Any Motion Filed by Defendants in Response to  
8 the Complaint and Defendants' Reply Pursuant to Civil Local Rules 6-1(b) and 6-2. I make this  
9 declaration based on my personal knowledge.

10 3. On July 1, 2024, Plaintiff filed the Complaint (ECF No. 1).

11 4. Plaintiff purported to have served the Summons and Complaint on Defendants on  
12 July 3, 2024 (ECF Nos. 7-9).

13 5. Defendants' deadline to answer or otherwise respond to the Complaint is July 24,  
14 2024.

15 6. The Parties have stipulated to extend Defendants' deadline to respond to the  
16 Complaint to August 28, 2024 (ECF No. 18).

17 7. Counsel for the Parties have met and conferred regarding an adjusted briefing  
18 schedule for any responsive motion that Defendants may file in response to the Complaint given  
19 counsels' existing conflicts and schedules, and agreed to extend (i) the deadline for Plaintiffs to  
20 oppose any motion that Defendants may file in response to the Complaint by 30 days to October  
21 11, 2024, and (ii) the deadline for Defendants' reply by 14 days to November 1, 2024.

22 8. The Parties do not intend for this extension of time to impact any other deadlines  
23 already fixed by Court order.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed July 23, 2024, in San Francisco, California.

26 By:   
27 Aaron T. Chiu  
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